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September 22, 2015

The Honorable Katherine B. Forrest
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
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Re: *In Re 650 Fifth Avenue and Related Properties*,
Case No. 08-cv-10934

Dear Judge Forrest,

I am writing in response to the letter filed yesterday at 5:15pm by attorney Robert Tolchin addressed to the Court in the above matter relating to claims of Avi Elishes and Gregg Salzman. Mr. Tolchin's letter is filled with false, scurrilous, irrelevant, and gratuitous assertions and is intended to besmirch the undersigned and the American Center for Civil Justice, Inc., an organization that has been at the forefront of assisting victims of terror obtain judgments and pursue recoveries from state sponsors of terror.

We intend to fully respond to Mr. Tolchin's letter. However, because of the Jewish holidays that are being celebrated this week and next, we intend to submit our response by Friday, October 2, 2015. We thank the Court for its consideration.

Respectfully,

NEAL M. SHER

cc: All Counsel of record via ECF

Ordered
Response by Oct. 2, 2015.
(Fine).

LCB. Jor
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9/23/15